

09-MJ-05262-CMP

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CLERK U.S. DISTRICT COURT WESTERN DISTRICT OF WASHINGTON AT TACOMA	
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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

UNITED STATES OF AMERICA,

Plaintiff,

v.

BILLY MIRANDA FLORES,
BILL CELEYA FLORES,
TINY BEAN-FLORES,
DANNY LEE SHERWOOD,
JAY TIMOTHY MOREHEAD, and
SHELBBIE INGHAM,

Defendants.

NO. MJ09-5262

COMPLAINT for VIOLATION

21 U.S.C. §§ 841(a)(1), and 841(b)(1)(C),
and 846

BEFORE United States Magistrate Judge J. Richard Creatura, 1717 Pacific Avenue, Tacoma, Washington.

The undersigned complainant being duly sworn states:

COUNT 1
(Conspiracy to Distribute Oxycodone)

Beginning at a time unknown, but within the last five years, and continuing through on or about October 18, 2009, in Pierce and King Counties, within the Western District of Washington, BILLY MIRANDA FLORES, BILL CELEYA FLORES, TINY BEAN-FLORES, DANNY LEE SHERWOOD, JAY TIMOTHY MOREHEAD, and SHELBBIE INGHAM, knowingly and intentionally did conspire with each other and with others, known and unknown, to distribute a mixture or substance containing oxycodone, a substance

1 controlled under Schedule II, Title 21, United States Code, Section 812.

2 All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C),
3 and 846.

4 And the Complainant states that this Complaint is based on the following information:

- 5 1. I am a Special Agent (SA) with the Federal Bureau of Investigation (FBI) assigned to
6 the Seattle Division, Tacoma Resident Agency. I have been an FBI Special Agent
7 since October 1998. Before becoming an FBI agent, I practiced law in Washington
8 State, primarily as a civil defense lawyer. After entering on duty with the FBI, I have
9 been continuously employed as a Special Agent investigating a wide variety of
10 criminal violations to include drugs, gangs, bank robbery, homicide, assault, rape,
11 child sexual assault, child pornography, fugitives, kidnapping, and white collar crime
12 investigations. I am currently assigned to the South Sound Gang Task Force
13 investigating primarily gangs and violent criminal enterprises.

14 INTRODUCTION

- 15 2. The information contained in this affidavit is based upon my investigation, my
16 training and experience, and information related to me by other law enforcement
17 agents and officers through oral and written reports. This investigation is a joint
18 investigation conducted by the FBI's South Sound Gang Task Force (SSGTF) and the
19 Drug Enforcement Administration's (DEA) Tacoma Narcotics Enforcement Team (T-
20 NET). Based upon the investigation conducted thus far, I submit there is probable
21 cause to believe that beginning at a time unknown, but within the last five years, and
22 continuing to the present time, within the Western District of Washington, Bill Celeya
23 Flores, Billy Miranda Flores, Tiny Bean-Flores, Danny Sherwood, Jay Timothy
24 Morehead, and Shelbie Ingham have been committing the crime of conspiracy to
25 distribute controlled substances (oxycodone), in violation of Title 21, United States
26 Code, Section 846. Furthermore, your Affiant submits there is probable cause to
27 believe that on the dates specified in the Counts outlined above (none dating back
28 before August 2008), Bill Celeya Flores, Billy Miranda Flores, Tiny Bean-Flores,

1 Danny Sherwood, Jay Timothy Morehead, and Shelbie Ingham, individually
2 committed the specified crimes of unlawful distribution of controlled substances
3 (oxycodone), in violation of Title 21, United States Code, Section 841(a)(1). Because
4 this affidavit is made for the limited purpose of establishing probable cause, I am not
5 including each and every fact learned by me and other agents and officers during the
6 investigation.

7 3. The Indian Smoke Shop is a privately owned business located at 7402 Pacific Hwy E.,
8 Milton, Washington, on Puyallup Tribal Trust Land. The Indian Smoke Shop is the
9 primary employer for Billy Miranda Flores (hereinafter Billy Flores). Although the
10 Indian Smoke Shop's apparent use is for the sale of tobacco products, Billy Flores
11 uses the business, especially the office, for the sale and distribution of oxycodone
12 (Oxycontin pills) and other controlled prescription drugs, and does so on a daily basis.
13 Billy Flores also distributes Oxycontin through sub-distributors, including his half-
14 brother Tiny Flores-Bean, Danny Lee Sherwood, Jay Timothy Morehead, and Shelbie
15 Ingham.

16 4. The Little Red Smoke Shop is a privately owned business located at 2721 Pioneer
17 Way, Tacoma, Wasington, on Puyallup Tribal Trust Land. The Little Red Smoke
18 Shop is the primary employer for Bill Celeya Flores (hereinafter Bill Flores), the
19 father of Billy Flores. Although the Little Red Smoke Shop's apparent use is for the
20 sale of tobacco products, Bill Flores also uses the business for the sale and distribution
21 of Oxycontin pills and other controlled prescription drugs.

22 5. During the course of this investigation, law enforcement has interviewed more than a
23 dozen sources of information and/or confidential sources and/or cooperating
24 defendants. Law enforcement has utilized the services of at least eight confidential
25 sources during the course of this investigation, who are cooperating with or assisting
26 law enforcement for various reasons, including working for prosecutorial
27 considerations and for monetary reasons. The specifics of each confidential source
28 will be more fully outlined below. The information provided to investigators by the

1 listed confidential sources was corroborated by other confidential sources or sources
2 of information, through regular and/or electronic surveillance, law enforcement
3 database checks, pen registers, and the actions of undercover agents. Under the
4 control of agents, the confidential sources have conducted controlled buys, provided
5 debriefs, obtained investigative information, negotiated drug transactions, introduced
6 undercover agents, and/or given informational debriefs following their arrests or as
7 requested by law enforcement. The confidential sources, cooperating defendants, or
8 sources of information described herein are listed as "confidential sources" for the
9 purpose of this affidavit. This has been done to simplify the document and outline
10 their information in a direct manner; some may not have acted as an official
11 "confidential source" for law enforcement. Furthermore, your Affiant has not
12 included each and every confidential source, cooperating defendant, or source of
13 information that provided information and/or services as part of this investigation
14 within this affidavit, as much of the information is overlapping and does not provide
15 additional probable cause above and beyond those facts already contained in this
16 affidavit. Additionally, the information provided by the confidential sources listed
17 herein does not contain all the information provided by those persons to law
18 enforcement.

- 19 6. Detailed further in this affidavit are several controlled evidence purchases made from
20 various members of the Flores Family organization by confidential sources and
21 undercover agents. During each and every controlled buy, agents searched the
22 confidential sources and any vehicles they used during the controlled purchase, both
23 before and after the transactions. Additionally, agents recorded these controlled
24 evidence purchases whenever possible, in an effort to corroborate the confidential
25 sources' actions.

26 INTRODUCTION OF CONFIDENTIAL SOURCES

- 27 7. **Confidential Source 1:** In July 2008, Confidential Source 1 (hereafter referred to as
28 CS-1) was arrested by law enforcement while in possession of prescription pills.

Following his/her arrest, CS-1 agreed to cooperate with law enforcement for
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1 sentencing consideration. CS-1 subsequently completed a cooperation agreement and
2 then agreed to continue assisting law enforcement for monetary benefits. CS-1 was
3 previously involved with Billy Flores as a sub-distributor and has first hand
4 knowledge of the Flores Family criminal operations.

5 8. **Confidential Source 2:** In August 2008, Confidential Source 2 (hereafter referred to
6 as CS-2) contacted the DEA Tacoma and provided detailed information about the
7 illegal activities of the Flores Family. CS-2 has no pending criminal charges and is
8 cooperating with law enforcement for monetary reasons only. CS-2 was involved in
9 the illegal distribution of prescription drugs with the Flores Family for a period of at
10 least five years and has first hand knowledge of the criminal operations. CS-2 has not
11 been given any assurances of non-prosecution by law enforcement for his/her previous
12 actions.

13 9. **Confidential Source 3:** Confidential Source 3 (hereafter referred to as CS-3) has
14 been arrested twice by law enforcement in connection with the distribution of
15 Oxycontin. CS-3 was a sub-distributor of Oxycontin for Billy Flores and has first
16 hand knowledge of the Flores Family illicit drug trafficking. CS-3 has had an ongoing
17 addiction to Oxycontin and has provided assistance/information to law enforcement
18 following each of CS-3's arrests in exchange for prosecutorial and sentencing
19 considerations. CS-3 has one outstanding criminal charge involving Oxycontin.

20 10. **Confidential Source 4:** In September 2008, Confidential Source 4 (hereafter referred
21 to as CS-4) contacted DEA Tacoma and provided detailed information about the
22 illegal activities of the Flores Family. CS-4 has no pending criminal charges and is
23 cooperating with law enforcement for monetary reasons only. CS-4 has been an
24 associate and previously a drug customer of the Flores Family for at least five years.
25 CS-4 has first hand knowledge of the criminal activities of Bill Flores and other
26 members of the Flores Family.

27 11. **Confidential Source 5:** In July 2009, Confidential Source 5 (hereinafter referred to
28 as CS-5) was arrested by law enforcement for prescription forgery. Following his/her
arrest, CS-5 agreed to cooperate with law enforcement for sentencing consideration.

1 CS-5 provided information about the criminal activities of Danny Sherwood.

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3 12. **Confidential Source 6:** In September 2008, Confidential Source 6 (hereafter referred
4 to as CS-6) contacted the Pierce County Sheriff's Office (PSCO) Special
5 Investigations Unit (SIU) and provided detailed information about the illegal activities
6 of the Shelbie Ingham. CS-6 has no pending criminal charges and is cooperating with
7 law enforcement for monetary reasons only.

8 13. **Confidential Source 7:** In September 2009, Confidential Source 7 (hereinafter
9 referred to as CS-7) was arrested by law enforcement while in possession of a large
10 quantity of Oxycontin pills. Following his/her arrest, CS-7 agreed to cooperate with
11 law enforcement for sentencing consideration. CS-7 provided information about the
12 criminal activities of Bill Flores, Billy Flores and Jay Morehead.

13 14. **Confidential Source 8:** In August 2009, Confidential Source 8 (hereinafter referred
14 to as CS-8) contacted law enforcement and expressed a desire to provide information
15 about the illegal activities of Bill and Billy Flores. CS-8 has been associated with Bill
16 and Billy Flores for at least four years and has extensive knowledge about their illegal
17 drug distribution. CS-8 has not been made any promises concerning either payment or
18 possible consideration with criminal charges. CS-8 was addicted to Oxycontin and is
19 providing information because he/she feels that Bill and Billy Flores are responsible
20 for his/her addiction.

21 **FACTS ESTABLISHING PROBABLE CAUSE**

22 15. Information Provided By CS-1: In June 2008, DEA agents interviewed CS-1, who
23 stated that he/she had been involved with trafficking Oxycontin for Billy Flores since
24 the spring of 2007. Initially that was done through a middleman, but CS-1 eventually
25 began dealing directly with Billy Flores. CS-1 knows from first hand knowledge that
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1 Billy Flores sells Oxycontin, marijuana, and methadone from the Indian Smoke Shop
2 in Milton, Washington. CS-1 has purchased Oxycontin from both the Indian Smoke
3 Shop and Billy Flores' residence, which is located at 2410 E. Pioneer, Puyallup,
4 Washington (not on tribal trust land). CS-1 further stated that Billy Flores sells
5 Oxycontin pills that contain 20 milligrams (mg), 40mg, and 80mg of oxycodone. For
6 the 80mg pills, Billy Flores charges \$45 to \$55 per pill, depending upon the amount
7 purchased and other factors. CS-1 further stated that Billy Flores also sells pound
8 quantities of marijuana, charging from \$1,700 to \$2,200 per pound. CS-1 further told
9 investigators that Billy Flores' source of Oxycontin is Canadian; however, Billy Flores
10 has at least two sources, including a middle-aged white female who CS-1 observed
11 delivering to Billy Flores on at least three occasions during the past year and a half.
12 When questioned about the quantity of pills that Billy Flores was selling and
13 distributing, CS-1 stated that he/she has observed and been told by Billy Flores that he
14 sells approximately eight hundred (800) to one thousand (1,000) Oxycontin pills each
15 day. CS-1 further stated that Billy Flores sells to at least 20 individuals, of which the
16 majority are dealers themselves and a few who are primarily just users. Furthermore,
17 CS-1 believes that Billy Flores only sells to users that have family ties to him and/or
18 are close friends. Agents also questioned CS-1 about where Flores completes his drug
19 transactions, to which CS-1 stated that Flores primarily sells the drugs in his office at
20 the Indian Smoke Shop and on rare occasions, at his residence in Puyallup,
21 Washington. On at least one occasion CS-1 has purchased Oxycontin from Flores at
22 Flores' residence. CS-1 added that Flores keeps the pills in two of three safes located
23 within the Indian Smoke Shop. One of the safes is located next to the cash register on
24 the ground floor, while the two safes used by Billy Flores to store the pills are located
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1 in Billy Flores' upstairs office. Flores uses the office for drug transactions since he
2 keeps his pills in the safes there and can conduct business in a more private manner.
3 CS-1 then provided agents with Flores' cellular phone number, 253-686-7901. CS-1
4 further described Flores as a Hispanic male, dark-skinned with short hair, 6'0" tall,
5 220lbs, and approximately thirty-five (35) years old. Furthermore, CS-1 believes that
6 Billy Flores' wife is a Puyallup Indian Tribal member, thereby linking Flores to the
7 Puyallup Tribe. CS-1 reiterated to agents that although Billy Flores acts as and says
8 that he is a Puyallup Indian Tribe member, he is in fact either Hispanic or Native
9 American from Arizona and is not a member of the Puyallup Tribe. CS-1 further
10 stated that Flores' father is Hispanic and also runs a smoke shop near Fife,
11 Washington on tribal land and that he also sells Oxycontin.

- 12
13 16. Attempted Controlled Buy From Billy Flores: On July 2, 2008, DEA Tacoma
14 attempted to conduct a controlled purchase of Oxycontin from Billy Flores at his
15 Indian Smoke Shop using the services of CS-1. Due to concerns by Billy Flores
16 regarding CS-1's recent arrest, however, Flores would not sell to CS-1. In fact, on
17 this date when CS-1 met with Billy Flores in his office above the Indian Smoke Shop,
18 Flores had CS-1 give the \$600.00 in pre-recorded government funds to Dan Corpman
19 who was present in the office. Flores then directed CS-1 to meet Dan Corpman away
20 from the Indian Smoke Shop to complete the transaction. Billy Flores then told CS-1
21 that he should not even be talking with CS-1, until CS-1 meets with Billy Flores and
22 his attorney to discuss CS-1's recent arrest. Billy Flores informed CS-1 that he was
23 concerned that CS-1 could be working with law enforcement and that is why he
24 stopped selling to CS-1. Later that day, Corpman met with CS-1 and returned the pre-
25 recorded government funds at the direction of Flores. In connection with this event,
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- 1 CS-1 spoke with Flores over the phone, who told CS-1 that he was told by his attorney
2 not to talk to CS-1 or meet with him until CS-1 met with Flores' attorney. Flores
3 offered to pay CS-1's attorney fees and implied that Flores' attorney could represent
4 CS-1. Flores further stated that CS-1 "can't have a DAC" (court appointed attorney).
5
- 6 17. Attempted Controlled Buy From Billy Flores: On July 29, 2008, DEA Tacoma again
7 attempted unsuccessfully to purchase Oxycontin from Billy Flores at the Indian
8 Smoke Shop. This attempted controlled buy did not occur due again to Flores'
9 concern that CS-1 may have been working with law enforcement. Furthermore, when
10 CS-1 met with Flores at the Indian Smoke Shop on this date, Flores told CS-1 that at
11 the direction of his attorney, Flores would not sell Oxycontin to CS-1 until CS-1 could
12 prove to Flores that CS-1's arrest and legal issues were resolved to Flores'
13 satisfaction.
- 14 18. Further Information From CS-1: In spite of Flores' reluctance to sell to CS-1, law
15 enforcement was able to learn valuable information from CS-1, who had been
16 purchasing hundreds of Oxycontin pills from Flores on a weekly basis for at least
17 twelve months. CS-1 informed agents that Flores spends a great deal of money
18 gambling. In fact, Flores travels to Las Vegas to gamble on boxing matches, where he
19 gambles and sometimes loses tens of thousands of dollars betting/gambling on boxing
20 matches in Las Vegas and in other gambling contests. This information was
21 corroborated by law enforcement through administrative subpoenas to obtain Cash
22 Transaction Records of Casinos (CTRC). From these records, which corroborate
23 statements by CS-1, law enforcement learned that during the past three years Flores
24 has lost more than one hundred thousand dollars to various casinos in Las Vegas.
25 Furthermore, CS-1 stated that as a result of the actions of law enforcement in 2004
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1 when hundreds of thousands of dollars were seized by the Bureau of Alcohol,
2 Tobacco, Firearms and Explosives (ATF) as the result of an investigation concerning
3 the Indian Smoke Shop and illegal cigarettes, Flores is now much more careful with
4 his money in order to avoid seizure by law enforcement. Consequently, Flores has
5 invested his drug proceeds in legitimate business ventures, including a laundry
6 business, a day spa, and a restaurant. In spite of his efforts to hide his drug proceeds,
7 Flores continues to spend his drug proceeds on his lavish lifestyle. According to CS-1
8 and surveillance efforts by agents, Flores has season tickets to the Seattle Seahawks
9 football games, including travelling to their away games, National Football League
10 Super Bowl games, and other high-profile sporting events. Additionally, CS-1 has
11 learned that Flores maintains young girlfriends, including minors, with whom he
12 trades sex for Oxycontin pills. When the girlfriends are arrested by law enforcement,
13 Flores moves on to another young female. Law enforcement and CS-1 have learned
14 that Flores provides the girlfriends with rent money, cars, phones, and apartments.
15 Law enforcement has corroborated CS-1's knowledge of the girlfriends through
16 surveillance, arrests, and supporting statements by cooperating defendants.

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18 19. Information Provided By CS-2: In early August 2008, DEA Tacoma was contacted by
19 CS-2, who provided detailed information regarding the Flores Family's criminal
20 activities, information about their criminal associates, and their involvement with
21 Billy Flores. In an effort to verify CS-2's information, DEA Tacoma directed CS-2 to
22 conduct a controlled purchase from Billy Flores.

23 20. Controlled Buy From Billy Flores Using CS-2: On August 14, 2008, CS-2 conducted
24 a controlled purchase from Billy Flores using \$250.00 of pre-recorded government
25 funds. Flores sold CS-2 five (5) 80mg Oxycontin pills. This controlled purchase
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1 occurred in the office of the Indian Smoke Shop. During the controlled purchase, CS-
2 2 observed no less than three people waiting at the Indian Smoke Shop to purchase
3 Oxycontin from Billy Flores. Following the controlled purchase, CS-2 stated that
4 he/she had witnessed people line up every day for years outside the Indian Smoke
5 Shop office to purchase Oxycontin from Billy Flores. When Billy Flores is not at the
6 Indian Smoke Shop the customers wait outside in their cars. Once Billy Flores
7 arrives, the customers line up inside the store, actually forming a line inside that
8 stretches through the downstairs door at the base of the office stairs, towards Billy
9 Flores' office where he sells the Oxycontin. The fact that customers wait outside the
10 Indian Smoke Shop in their cars and line up inside the store has been corroborated by
11 additional confidential sources and by a DEA agent working in an undercover
12 capacity.

- 13
14 21. Further Information Provided By CS-2: CS-2 provided detailed historical information
15 regarding the Flores Family. According to CS-2, Billy Flores is the son of Bill Flores,
16 and they are both Hispanic. Bill Flores married Gloria Bean, a Puyallup Tribal
17 member. Gloria adopted Billy Flores, and then had four more children with Bill
18 Flores, including Tiny Bean-Flores, Thuhiksiab Fats Bean-Flores, and Soubyachhe
19 Big Bean-Flores. Gloria Bean had one son previous to her marriage to Bill Flores,
20 David Jacques Bean. Gloria Bean was the owner of the Indian Smoke Shop, and after
21 her death in 2002 her children continued to run the Indian Smoke Shop. Billy Flores
22 assumed the duties as the manager, commenced trafficking drugs from the business,
23 and has done so for more than ten years. Prior to his arrest by ATF, David Bean
24 worked at the Indian Smoke Shop, but he has not been around since the arrests
25 approximately three years ago. Washington State business records indicate that David
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1 Bean is the current owner of the Indian Smoke Shop. Throughout this time Billy
2 Flores has sold various prescription drugs, marijuana, and cocaine, utilizing various
3 sources of supply.
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- 5 22. Controlled Buy From Billy Flores Using CS-2: On August 20, 2008, under the
6 guidance of agents, CS-2 arranged for an unnamed buyer to purchase one hundred
7 (100) Oxycontin 80mg pills at a price of \$50.00 per pill from Billy Flores.
8 Surveillance agents observed the unnamed buyer arrive at the Indian Smoke Shop and
9 enter the business. Through the use of CS-2, Flores sold the 100 pills for \$5,000.00 to
10 the unnamed buyer. As payment for setting up this transaction, Flores paid CS-2 with
11 four methadone pills. According to CS-2, when this transaction took place, Flores led
12 CS-2 upstairs to his office where he retrieved the 100 Oxycontin pills from one of his
13 safes. Furthermore, while CS-2 and the unnamed buyer were leaving the Indian
14 Smoke Shop, an employee of the smoke shop, only known to CS-2 as "Sam," offered
15 to sell the unnamed buyer small amounts of marijuana, which the unnamed buyer
16 agreed to do. Furthermore, CS-2 has in the past observed "Sam" selling marijuana
17 from behind the Indian Smoke Shop front counter, where "Sam" keeps the marijuana
18 hidden. Within minutes of the transaction, agents arrested the unnamed buyer while in
19 possession of the Oxycontin pills purchased from Flores, plus an additional twenty-
20 three (23) Oxycontin 80 mg pills, thirteen (13) Oxycontin 40mg pills, and a small
21 amount of marijuana. The unnamed buyer agreed to cooperate with law enforcement.

- 22 23. Controlled Buy From Billy Flores Using Undercover Agent: On September 25, 2008,
23 DEA SA Eric Wattree, acting in an undercover capacity, met with Billy Flores and the
24 cooperating unnamed buyer (described in paragraph 22 above) at the Indian Smoke
25 Shop. CS-2 arranged the meeting. SA Wattree purchased seventy (70) Oxycontin
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1 80mg pills from Billy Flores for \$3,500.00 in pre-recorded government funds (\$50.00
2 per pill). SA Wattree saw Billy Flores walk upstairs to the office to get the pills.
3 Billy Flores then came back downstairs and completed the transaction. Billy Flores
4 asked SA Wattree if he or the cooperating unnamed buyer were affiliated with law
5 enforcement, which they both denied. While SA Wattree and the unnamed cooperator
6 were counting the Oxycontin pills and money, Billy Flores directed them to get out of
7 sight of his security cameras. Billy Flores eventually moved the camera monitor so
8 that other persons in the Indian Smoke Shop could not observe their transaction. At
9 the conclusion of the transaction, Billy Flores agreed to sell to SA Wattree again in the
10 future.

- 11 24. Controlled Buy From Billy Flores Using Undercover Agent: On October 10, 2008,
12 SA Wattree acting in an undercover capacity again met with Billy Flores and
13 purchased one hundred (100) Oxycontin 80 mg pills for a price of \$4,500.00 (\$45.00
14 per pill). Like the previous controlled purchase from Billy Flores, this purchase took
15 place at the Indian Smoke Shop. SA Wattree observed Billy Flores walk upstairs to
16 his office to get the 100 Oxycontin pills. SA Wattree arrived at the Indian Smoke
17 Shop as Flores was completing some form of what appeared to be an illegal
18 transaction in the downstairs back room of the smoke shop. Upon meeting with SA
19 Wattree, Billy Flores reiterated to SA Wattree that he was intimidated by his size;
20 however, Flores asked SA Wattree how many pills he wanted and then lowered the
21 price to \$45.00 per pill as compared with the \$50.00 per pill price in their previous
22 transaction two weeks earlier. As with the first transaction, SA Wattree observed
23 Flores walk up to his office to get the pills. Billy Flores informed SA Wattree that he
24 could usually get more pills during the beginning and end of every month. SA
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1 Wattree then asked Billy Flores about one of Flores' Cadillac Escalades, to which
2 Billy Flores replied that he was selling the vehicle. Flores stated that he had paid
3 \$68,000.00 for the Escalade two years ago. Billy Flores then told SA Wattree that he
4 has eight vehicles total in his collection.
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6 25. Controlled Buy From Billy Flores Using Undercover Agent: On October 22, 2008,
7 SA Eric Wattree acting in an undercover capacity purchased ninety (90) Oxycontin
8 80mg pills from Billy Flores at the Indian Smoke Shop for a price of \$4,500.00 in pre-
9 recorded government funds (\$50.00 per pill).

10 26. Vehicle Driven By Billy Flores: Surrounding the controlled buys from Billy Flores at
11 the Indian Smoke Shop, Flores was observed coming to and leaving the Indian Smoke
12 Shop while driving a silver 2007 Cadillac Escalade with Washington license
13 B71837D registered to Tiny Bean-Flores II and Billy Flores.

14 27. Further Observations By SA Wattree: During each of the transactions between SA
15 Wattree and Billy Flores, SA Wattree observed additional buyers either waiting for
16 Flores to complete the transaction with SA Wattree or other buyers completing their
17 drug transactions with Flores. In fact, during the October 22, 2008 transaction, SA
18 Wattree stood in line behind several customers and in front of others who had lined up
19 at the base of the Indian Smoke Shop office stairs to purchase Oxycontin pills from
20 Flores. On two other occasions in November and December 2008, SA Eric Wattree
21 attempted to make additional controlled buys from Billy Flores; however, on each
22 occasion Flores was not present at the Indian Smoke Shop. It was the goal of
23 investigators to learn if Flores would allow SA Wattree to buy the Oxycontin pills
24 from another member of the Flores Family. For this reason, DEA Tacoma and
25 assisting law enforcement agencies conducted surveillance on Flores to ensure he was
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1 away from the Indian Smoke Shop. In spite of SA Wattree's requests, Flores offered
2 to meet him at a later date or time and the additional controlled buys did not take
3 place.
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- 5 28. Information Provided By CS-3: In February 2009, CS-3 was arrested by law
6 enforcement in connection with the distribution of Oxycontin. Following CS-3's
7 arrest, he/she agreed to cooperate with law enforcement and provided a series of
8 debriefs, during which CS-3 outlined the extent of his/her knowledge of Billy Flores'
9 drug trafficking activities and that of other members of the Flores Family. During the
10 debriefs, CS-3 stated that he/she has known Billy Flores for a little less than one year.
11 CS-3 has spent a great deal of time in Billy Flores' office at the Indian Smoke Shop,
12 and was present during countless drug deals in Billy Flores' office. According to
13 statements made by Billy Flores to CS-3, he makes approximately \$15,000.00 each
14 week selling Oxycontin and sells more than 4,000 Oxycontin 80mg pills each week to
15 make that much money. CS-3 stated that Billy Flores comes to the Indian Smoke
16 Shop each day between 9:00 am and 10:00 am and then leaves each day at
17 approximately 4:30 pm, only to return to the Indian Smoke Shop from 9:00pm to
18 10:00pm. While at the Indian Smoke Shop, Billy Flores sells Oxycontin throughout
19 the day and again when he returns at night. CS-3 has observed Billy Flores
20 conducting the majority of his business inside of his office at the Indian Smoke Shop
21 and does so because he keeps his pills and drug money in the two safes in his office.
22 CS-3 stated that Billy Flores habitually maintains a room at the Baymont Inn and
23 Suites in Fife, Washington, most often in Room 112. CS-3 has seen Billy Flores
24 meeting with additional Oxycontin sources and other prescription pill sources at room
25 112. CS-3 advised that Billy Flores will give extra room keys to his girlfriends. This
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1 information was corroborated by CS-1. CS-1 was handed a room key by one of Billy
2 Flores' girlfriends who stated that she did not want the key anymore. CS-1
3 subsequently turned the key over to investigators.
4

5 29. Controlled Buy From Tiny Bean-Flores Using CS-3: In addition to Billy Flores, CS-3
6 has purchased Oxycontin from Tiny Bean-Flores. According to CS-3, Tiny Bean-
7 Flores sells the Oxycontin pills for Billy Flores when Flores is absent. Bean-Flores
8 also sells prescription pills to his own customers when Billy Flores is at the shop. In
9 order to verify this information, investigators directed CS-3 to call Tiny Bean-Flores
10 during the first week of April 2009. After making contact with Bean-Flores and under
11 the direction of investigators, on April 3, 2009, CS-3 made a controlled purchase of
12 twelve (12) Oxycontin 80mg pills from Tiny Bean-Flores at the Indian Smoke Shop.
13 During this controlled buy, Billy Flores and his immediate family were on vacation in
14 California. CS-3 paid Bean-Flores with \$480 of pre-recorded government funds
15 (\$40.00 per pill).

16 30. Arrest of CS-3 By Milton Police: The Milton Tavern is located at the intersection of
17 Pacific Highway and Porter Way, directly across the street from the Indian Smoke
18 Shop. On April 16, 2009, after receiving multiple complaints from the Milton Tavern
19 management regarding continuous drug deals that take place in their parking lot,
20 Milton Police proceeded to the tavern to investigate. Upon arriving at the location,
21 officers arrested CS-3 in possession of thirteen (13) Oxycontin 80mg pills. Two other
22 suspects were also arrested. Previous to this event, law enforcement had learned that
23 CS-3 had begun selling Oxycontin pills for Billy Flores again in order to support
24 his/her addiction. Following their arrests, CS-3 and one other suspect cooperated with
25 law enforcement and both provided statements regarding their involvement with Billy
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1 Flores. CS-3 had planned to sell Oxycontin to one of the other suspects for Billy
2 Flores. Shortly before their arrest, CS-3 met with Billy Flores in his office at the
3 Indian Smoke Shop and purchased twenty two (22) Oxycontin 80mg pills at a price of
4 \$40.00 each. CS-3 conducted one ten pill deal at the Milton Tavern with two
5 unidentified customers before CS-3 was arrested while attempting to deliver to
6 another customer, the cooperating suspect described earlier in this paragraph. The
7 cooperating suspect stated that he/she had met with CS-3 to buy Oxycontin pills;
8 however, he/she also knew that the pills were coming from "Indian Billy."
9

10 31. Information Provided By CS-4: In September 2008, CS-4 contacted law enforcement
11 and stated that he/she could assist law enforcement by providing information and
12 other services regarding Bill Celeya Flores. FBI Tacoma and the SSGTF
13 subsequently interviewed CS-4 and learned that CS-4 has known Bill Flores for more
14 than ten years. During that time, Bill Flores has always illegally sold prescription
15 drugs. CS-4 started buying Oxycontin from Bill Flores five years ago, but quit months
16 prior to assisting law enforcement. The biggest purchase from Bill Flores by CS-4
17 was one hundred (100) pills, which occurred on two separate occasions, with the most
18 recent occurring seven to eight months before CS-4 approached law enforcement.
19 CS-4 usually bought from Flores once or twice a month, two or three pills at a time.
20 When CS-4 was buying pills regularly from Flores, CS-4 would purchase ten to
21 fifteen (10 to 15) pills a month. The majority of these drug transactions between CS-4
22 and Bill Flores occurred in the office at the Little Red Smoke Shop.

23 32. Controlled Buy From Bill Flores Using CS-4: On October 16, 2008, under the
24 direction of the SSGTF, CS-4 called Bill Flores and arranged to purchase ten (10)
25 Oxycontin 80mg pills. Prior to this transaction, the SSGTF followed Bill Flores from
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1 his residence in Tacoma, Washington to the Little Red Smoke Shop, where he
2 completed the transaction for \$800.00 of pre-recorded government funds (\$80.00 per
3 pill).

4
5 33. Controlled Buy From Bill Flores Using CS-4: On October 30, 2008, under the control
6 and direction of investigators, CS-4 again purchased ten (10) Oxycontin 80mg pills
7 from Bill Flores for the same price as before, \$800.00 of pre-recorded government
8 funds. CS-4 conducted this controlled buy from Bill Flores at the Little Red Smoke
9 Shop. During this transaction, Bill Flores was observed by CS-4 getting the
10 Oxycontin pills from within a safe in his office. CS-4 could see that more pills
11 remained in the bottle after CS-4 bought his/her ten pills

12 34. Controlled Buy From Bill Flores Using CS-4: On November 5, 2008, under the
13 control and direction of investigators, CS-4 purchased six (6) Oxycontin 80mg pills
14 from Bill Flores at the Little Red Smoke Shop for a price of \$480.00 in pre-recorded
15 government funds (\$80.00 per pill). CS-4 advised that CS-4 saw a closed safe in the
16 office. Bill Flores opened the safe and took out a lockbox. Flores opened the lockbox
17 with a key from his key chain and gave CS-4 Oxycontin out of the lockbox.

18 35. Controlled Buy From Bill Flores Using CS-4: On November 20, 2008, under the
19 control and direction of investigators, CS-4 purchased one hundred (100) Oxycontin
20 80mg pills from Bill Flores at the Little Red Smoke Shop for a price of \$8,000.00 in
21 pre-recorded government funds (\$80.00 per pill).

22 36. Controlled Buy From Bill Flores Using CS-4: On February 5, 2009, under the control
23 and direction of investigators, CS-4 purchased nine (9) Oxycontin 80mg pills and
24 twelve (12) Oxycontin 40mg pills from Bill Flores for a price of \$1,040.00 of pre-
25 recorded government funds. CS-4 attempted to purchase fifteen Oxycontin 80mg
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1 pills; however, Bill Flores did not have that many 80mg pills and therefore sold CS-4
2 twice as many 40mg pills.

3 37. Controlled Buy From Bill Flores Using Undercover Agent: On May 7, 2009, CS-4
4 introduced DEA Special Agent Errin Jewell in an undercover capacity as the source of
5 CS-4's buy money for the previous buys. After completing directed phone
6 conversations with Bill Flores, which were recorded by FBI Agents, CS-4 arranged
7 for SA Jewell to meet with Bill Flores and purchase one hundred (100) Oxycontin
8 80mg pills. SA Jewell, acting in an undercover capacity and accompanied by CS-4,
9 then drove to the Little Red Smoke Shop where SA Jewell was introduced to Bill
10 Flores. After arriving at the shop, Bill Flores advised SA Jewell and CS-4 that he did
11 not have the Oxycontin pills with him. Flores then proceeded to make two phone calls
12 to his suspected source of supply. Bill Flores then asked SA Jewell and CS-4 to come
13 back in 30 minutes to complete the transaction. SA Jewell and CS-4 left the Little
14 Red Smoke Shop while other agents maintained surveillance on the building.
15 Surveillance agents then followed Bill Flores as he drove directly to the Indian Smoke
16 Shop. Flores drove a black 2005 Ford F150 pickup with Washington license
17 A56248Z, registered in the name of Ralph Severson. Billy Flores' Cadillac Escalade
18 was parked at the Indian Smoke Shop when Bill Flores arrived and entered the shop.
19 This event occurred between 9:00 pm and 10:00 pm, the time at which Billy Flores is
20 known by law enforcement to conduct drug business. After a brief stay inside of the
21 Indian Smoke Shop, Bill Flores called CS-4 and stated that he had the pills and to
22 meet him at a specific location in Tacoma, Washington. Surveillance agents then
23 followed Bill Flores directly with no stops to the specific location described by Bill
24 Flores in Tacoma, Washington. Shortly thereafter, SA Jewell purchased one hundred
25 (100) Oxycontin 80mg pills from Flores for a price of \$6,500.00 of pre-recorded
26 government funds (\$65.00 per pill). During the transaction, Flores handed a pill bottle
27 with the label removed to SA Jewell, who handed Flores the recorded funds. An
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unnamed cooperating defendant told investigators that the Ford F150 was taken by Bill Flores from Severson as payment for a drug debt.

38. Controlled Buy From Bill Flores Using Undercover Agent: On June 16, 2009, CS-4 and SA Jewell purchased ninety eight (98) Oxycontin 80mg pills from Bill Flores at the Little Red Smoke Shop for a price of \$6,500.00 using pre-recorded government funds. The original purchase was to have been for 100 pills (for an agreed upon price of \$65.00 per pill); however, after the transaction, it was determined that Flores had "shorted" SA Jewell by two pills. CS-4 contacted Flores about the discrepancy, and Flores advised that he would give SA Jewell a price break on his next purchase.
39. Arrest of Bill Flores By Fife Police: On June 18, 2009, Bill Flores was stopped by the Fife Police Department for suspicion of driving while intoxicated while driving the above-described black Ford F150. Flores was carrying a .45 caliber AMT pistol on his person in an ankle holster. The pistol was loaded with five rounds in the magazine, but no round in the chamber. Flores was subsequently arrested for Driving Under the Influence (DUI). Three (3) 10mg methadone tablets were found in Flores' pants pocket. The truck was impounded and searched. Found inside the truck were a partially full bottle of Jack Daniels whiskey and a prescription bottle for Michael Dickjose labeled "Methadone" which contained seven (7) 10mg methadone tablets. Flores was charged in Pierce County Superior Court with one count of Unlawful Possession of a Controlled Substance and one count of Driving Under the Influence of Intoxicants. Both charges were subsequently dismissed without prejudice.
40. Information Regarding Weapons Possessed And Used By Bill Flores, Billy Flores, And Others: CS-2 and CS-4 have told investigators that Bill Flores is always armed, and that he carries a pistol in an ankle holster. They have also described how Flores has a shotgun mounted on a beam above his desk at the Little Red Smoke Shop, and a gun underneath the desk. Flores is a Carry Concealed Weapons (CCW) permit holder. CS-8 has advised that Bill Flores has several guns inside the Little Red Smoke Shop

1 and that Billy Flores keeps a handgun in his vehicle and additional guns in his upstairs
2 office at the Indian Smoke Shop. CS-2 advised that Billy Flores, Jay Morehead and
3 Brandon Morehead purchase and/or sell stolen firearms. After CS-1 was robbed
4 during an attempted drug deal in 2008, Billy Flores offered to provide CS-1 with an
5 enforcer/hit man to exact retribution against the robbers.

6 41. Controlled Buy From Bill Flores Using Undercover Agent: On August 27, 2009, SA
7 Jewell purchased two hundred thirty four (234) Oxycontin 40mg pills from Bill Flores
8 at the Little Red Smoke Shop for a price of \$7,500.00 using pre-recorded government
9 funds. CS-4 had called Bill Flores earlier that day to arrange for SA Jewell to
10 purchase one hundred fifty (150) Oxycontin 80mg pills.

11 42. When SA Jewell arrived at the Little Red Smoke Shop, Bill Flores advised that he was
12 not able to get the 80mg pills, but that he would sell SA Jewell 40mg pills at half
13 price. Flores told SA Jewell that he would have to travel to his source to get the pills,
14 and that he would have to drive down toward "512" (State Route 512) to get the pills.
15 SA Jewell left the Little Red Smoke Shop while surveillance agents maintained
16 surveillance on the business. Bill Flores left shortly thereafter driving a red 1971
17 Chevrolet Nova with Washington license 229-MSF registered to Bill Flores, followed
18 by surveillance agents. Flores drove to the QFC parking lot located at the 11100
19 block of Pacific Avenue South, parked at the lot, and waited approximately ten
20 minutes. Flores then left the QFC and returned to the Little Red Smoke Shop. SA
21 Jewell re-entered the Little Red Smoke Shop and contacted Flores, who told SA
22 Jewell that there had been a communication problem and the supplier was instead
23 coming to the Little Red Smoke Shop. Flores told SA Jewell that the female that
24 would be bringing his pills was one of his main suppliers. Flores said that he had two
25 main suppliers, but this one was more reliable. Flores added that the supplier drives
26 down through Oregon, where she gets the pills from nursing homes. A grey minivan
27 then arrived at the Little Red Smoke Shop. Flores advised SA Jewell that his source
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1 was in the vehicle, and Flores walked over to the minivan. After approximately one
2 minute, Flores returned from the minivan and led SA Jewell inside the smoke shop.
3 Flores told SA Jewell that he had 300 pills, and SA Jewell gave Flores \$7,500.00 of
4 pre-recorded government funds. Flores then counted out \$4,000.00, walked out
5 momentarily, and returned without the money. Flores and SA Jewell then discussed
6 how many pills SA Jewell could buy, eventually settling on 234 Oxycontin 40mg pills
7 (approximately \$32.00 per 40mg pill, or roughly \$64.00 per the equivalent number of
8 80mg pills).

- 9 43. Controlled Buy From Danny Sherwood Using CS-5: On August 11, 2009, under the
10 control and direction of investigators, CS-5 purchased two (2) Oxycontin 80mg pills
11 from Danny Sherwood in Pierce County, Washington for a price of \$100.00 in pre-
12 recorded government funds (\$50.00 per pill). Sherwood was driving a white 2009
13 Nissan Altima with Washington license 416-YHD, registered to Enterprise Leasing
14 Company and rented in the name of Billy Flores. The transaction took place in the
15 Altima. CS-4 advised investigators that Sherwood had approximately 200 more
16 Oxycontin 80mg pills with him. Enterprise Rental later advised that Billy Flores had
17 been renting the Altima since June 29, 2009.
- 18 44. Controlled Buy From Danny Sherwood Using CS-5: On August 27, 2009, under the
19 control and direction of investigators, CS-5 purchased ninety nine (99) Oxycontin
20 80mg pills from Danny Sherwood at a parking lot in Pierce County, Washington for a
21 price of \$4,000.00 in pre-recorded government funds (\$40.00 per pill for the agreed
22 upon amount of 100 pills; Sherwood shorted CS-5 one pill). Sherwood was driving a
23 black BMW 7 series sedan with a temporary license tag. The transaction took place in
24 the BMW.
- 25 45. Controlled Buy From Danny Sherwood Using CS-5: On September 22, 2009, under
26 the control and direction of investigators, CS-5 purchased one hundred (100)
27 Oxycontin 80mg pills from Danny Sherwood at a parking lot in King County,
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1 Washington for a price of \$4,000.00 in pre-recorded government funds (\$40.00 per
2 pill). Prior to CS-5 contacting Sherwood, surveillance was established on the Indian
3 Smoke Shop. When CS-5 called Sherwood to set up the purchase, Sherwood advised
4 CS-5 that he did not currently have enough pills. Sherwood told CS-5 that the deal
5 would have to happen later that evening. Sherwood was then observed arriving at the
6 Indian Smoke Shop driving a black 2003 BMW 745 sedan with Washington license
7 867-ZMB registered to Darren Sherwood. Within a minute, Billy Flores arrived at the
8 Indian Smoke Shop driving a blue Hummer H2 with Washington license B17221D
9 registered to Billy Flores. Sherwood and Billy Flores entered the Indian Smoke Shop.
10 Sherwood then left the shop and was surveilled into the area of 373rd Street South in
11 Federal Way, where surveillance was terminated. CS-5 then spoke with Sherwood,
12 who arranged to meet CS-5 at a parking lot in King County. A short time later, CS-5
13 met with Sherwood, who was now driving a grey 2000 Jeep Grand Cherokee with
14 Washington license 569-VBT registered to Danny Sherwood. CS-5 purchased 100
15 Oxycontin 80mg pills from Sherwood. Both the black BMW and the Jeep Grand
16 Cherokee were observed later that evening at 37125 12th Avenue South, Federal Way,
17 Washington, and on several occasions since.

- 18 46. Controlled Buy From Shelbie Ingham Using CS-6: On September 3, 2009, under the
19 control and direction of investigators, CS-6 purchased five (5) Oxycontin 80mg pills
20 from Shelbie Ingham at a parking lot in Fife, Washington for \$300.00 in pre-recorded
21 funds (\$60.00 per pill).
- 22 47. Controlled Buy From Shelbie Ingham Using CS-6: On September 10, 2009, under the
23 control and direction of investigators, CS-6 purchased five (5) Oxycontin 80mg pills
24 from Shelbie Ingham at the Indian Smoke Shop for \$300.00 in pre-recorded funds
25 (\$60.00 per pill). Ingham took CS-6 with her to the Indian Smoke Shop after Ingham
26 spoke on the phone with her boyfriend, Billy Flores, who stated that he had the pills at
27 the smoke shop. CS-6 gave Ingham the buy money and Ingham entered the smoke
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shop. Ingham then exited the smoke shop and gave the pills to CS-6.

1 48. Controlled Buy From Shelbie Ingham Using CS-6: On September 15, 2009, under the
2 control and direction of investigators, CS-6 purchased forty nine (49) Oxycontin 80mg
3 pills from Shelbie Ingham at the Indian Smoke Shop for \$2250.00 in pre-recorded
4 funds (approximately \$45.00 per pill). CS-6 contacted Ingham and traveled with her
5 to the Indian Smoke Shop. Ingham was driving a silver 2000 Buick Century sedan
6 with Washington license 754-VWQ registered to Billy Flores. Shortly before their
7 arrival, Billy Flores arrived at the Indian Smoke Shop driving a blue Hummer H-2
8 with Washington license B17221D registered to Billy Flores. Upon arriving at the
9 Indian Smoke Shop, Ingham entered the building. Ingham quickly exited the building,
10 got into the Buick, and gave 49 pills to CS-6. Ingham had received 50 pills from
11 Flores, but told CS-6 that she was keeping one pill for herself as payment for
12 brokering the deal.

13 49. Arrest Of Jay Morehead By Fife Police: On August 13, 2009, the SSGTF and T-NET
14 established surveillance on the Indian Smoke Shop. Jay Morehead was observed
15 arriving at the shop at approximately 9:55 pm and leaving shortly thereafter.
16 Morehead was driving a black Dodge Charger with Washington license 539-WFD, a
17 vehicle which he had been known to drive on other occasions. Based upon
18 Morehead's history with Billy Flores, the time of night that Morehead was at the
19 Indian Smoke Shop, and the short amount of time that Morehead had spent inside the
20 Indian Smoke Shop, investigators determined that there was reason to believe that
21 Morehead was in possession of drugs, a weapon, or both. Morehead's vehicle was
22 located by Fife Police, who observed that the vehicle had tail lights with a dark
23 covering that dimmed the lights beyond visibility of the required 1,000 feet to the rear.
24 Morehead was stopped and asked to step out of the vehicle. As Morehead was
25 speaking to the officer, Morehead suddenly reached into the open driver side window.
26 Morehead was restrained and handcuffed for officer safety, and the vehicle searched.
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1 A large knife approximately eight inches (8") long was found in the rear driver side
2 door compartment. When the officers attempted to search Morehead's person,
3 Morehead started resisting. Morehead was taken to the ground. A plastic baggie
4 containing fifty six (56) green Oxycontin pills was observed on the ground where
5 Morehead's left leg was. Morehead was arrested for Obstructing a Public Servant,
6 Resisting Arrest and Possession of a Dangerous Weapon; the charges are still pending.

7 50. Contact with Wayne Flores: On August 11, 2009, the SSGTF and T-NET established
8 surveillance around the Indian Smoke Shop. Both the blue Hummer H-2 and the
9 silver Cadillac Escalade (previously described) were parked at the shop. At
10 approximately 4:40 pm, Bill Flores arrived and entered the shop. Wayne Flores
11 arrived shortly after, driving a white 2006 Dodge Ram pickup with Washington
12 license B10594B registered to Diane and Steven Grasser. Upon arriving, Wayne
13 Flores met with Billy Flores at the front of the store and then followed him inside. At
14 approximately 5:05 pm, Wayne Flores departed from the smoke shop in the Dodge
15 pickup. A Fife police officer followed Wayne Flores until he committed a traffic
16 violation. Wayne Flores was stopped and found to have a suspended license. Flores
17 consented to a search of the area where he was sitting in the truck. A prescription bag
18 and receipt from the Puyallup Tribal Health Center were found and Flores advised that
19 he had just picked up a prescription for ibuprofen, percocet and Oxycontin. The bag
20 contained ibuprofen, but no percocet or Oxycontin. In the door of the vehicle, the
21 officer located a pill bottle dated prior to August 2009 containing approximately ten
22 (10) percocet pills. Flores stated that he gets ninety (90) Oxycontin pills every week
23 from the Puyallup Tribal Health Center, but he could not explain where the narcotic
24 pills were.

25 51. Information Supplied By CS-7: CS-7 advised that he/she had supplied Oxycontin pills
26 to Bill Flores and Jay Morehead multiple times within the last year. CS-7 supplied
27 Oxycontin to Bill Flores at the Little Red Smoke Shop on two occasions, in amounts
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1 from 100 to 300 pills. CS-7 supplied Oxycontin to Jay Morehead approximately five
2 times, both on the street and at Morehead's residence. CS-7 supplied Morehead in
3 quantities of approximately 200 pills each time.

- 4 52. Information Supplied By CS-8: CS-8 has known Bill and Billy Flores for several
5 years, and has extensive knowledge about the business practices of both men, both
6 illegal and legal. CS-8 advised that the Indian Smoke Shop is a business front to hide
7 Billy Flores' illegal drug trafficking. CS-8 observed that the majority of business at
8 the Indian Smoke Shop was drug trafficking, with cigarette sales only accounting for
9 no more than approximately 30% of the shop's business. CS-8 explained that to mean
10 that 30% or fewer of the people entering the shop were there to just buy tobacco
11 products, whereas 70% or more of the customers were there to buy illegal drugs
12 (although some would also occasionally buy cigarettes while there). CS-8 has
13 observed hundreds of drug transactions take place at the Indian Smoke Shop. Over
14 the last several years, CS-8 has supplied more than \$100,000 worth of Oxycontin to
15 Bill and Billy Flores.
- 16 53. I know from experience what Oxycontin pills look like. Oxycontin pills contain the
17 active ingredient of oxycodone which is a substance controlled under Schedule II,
18 Title 21, United States Code, Section 812.

19 CONCLUSION

- 20 54. Probable Cause For Criminal Complaints: Based upon the foregoing, your Affiant
21 submits that there is probable cause to believe that beginning at a time unknown but
22 within the last five years and continuing to the present time, within the Western
23 District of Washington, Bill Celeya Flores, Billy Miranda Flores, Tiny Bean-Flores,
24 Danny Sherwood, Jay Timothy Morehead, and Shelbie Ingham have been committing
25 the crime of conspiracy to distribute controlled substances (oxycodone), in violation
26 of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C) 846. Furthermore,
27 there is probable cause to believe that on the dates specified in the explanatory
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1 paragraphs outlined above (none dating back before August 2008), that Bill Celeya
2 Flores, Billy Miranda Flores, Tiny Bean-Flores, Danny Sherwood, Jay Timothy
3 Morehead, and Shelbie Ingham individually committed the specific crime of
4 distribution of a controlled substances (oxycodone), in violation of Title 21, United
5 States Code, Section 841(a)(1), and 841(b)(1)(C).

6 

7 DONALD A. TREAT, Complainant
8 Special Agent, Federal Bureau of Investigation

9 Based on the Complaint and Affidavit sworn to before me, and subscribed in my
10 presence, the Court hereby finds that there is probable cause to believe the defendants
11 committed the offense set forth in the Complaint:

12
13 SUBSCRIBED AND SWORN to before me this 19 day of October, 2009.

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15 
16 KAREN L. STROMBOM J. RICHARD CREATURE
17 United States Magistrate Judge